

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Selig Sealing Products
Attn: Robert Owen Smith
342 East Wabash
Forrest, Illinois 61741

Application No.: 95120137
Applicant's Designation: EXTRUDER #2
Subject: Coating and Printing
Date Issued: August 7, 2003
Location: 342 East Wabash, Forrest

I.D. No.: 105045AAJ
Date Received: July 31, 2003
Expiration Date: October 4, 2006

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of three extruders, four laminating stations and eight flexographic printing stations, and fuel combustion emission units pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material to less than 100 tons per year). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. Emissions and operation of the coating and printing processes shall not exceed the following limits:

<u>Material</u>	<u>Material Usage</u>		<u>VOM</u>	<u>VOM Emissions</u>	
	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>Content</u> <u>(Wt. %)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Acetone-Based Adhesive Solvent	10.6	84.8	100.0	10.6	84.8
Coreactant	3.5	27.8	25.0	0.9	7.0
Water-Based Adhesive	6.5	51.8	0.3	0.1	0.16
Solvent Based Ink	0.2	0.2	55.6	0.1	0.11
Water-Based Ink	4.8	38.3	13.5	0.4	5.17
Ink Solvent	0.1	0.6	100.0	0.1	0.6
Primer	0.3	2.0	5.0	0.1	0.1
Overcoat	0.3	2.5	4.0	0.1	0.1
			Total	12.23	98.0

These limits are based on the maximum material usage and the maximum VOM content. Compliance with the annual limits shall be determined from a running total of 12 months of data.

- 3a. The coatings applied to paper using the 3 laminators shall not exceed 2.9 lb VOM/gal of coating (minus water and any compounds which are exempted from the definition of VOM) as applied at each applicator, pursuant to 35 Ill. Adm. Code 215.204(c) (1).
- b. Emissions of volatile organic material from each individual process emission unit shall not exceed 8 lb/hour, pursuant to 35 Ill. Adm. Code 215.301.
- 4a. Emissions and operation of the fuel combustion equipment shall not exceed the following limits:

<u>Total Maximum Firing Rate</u> <u>(mmBtu/Hr)</u>	<u>Pollutant</u>	<u>Emission</u> <u>Factor</u> <u>(Lb/mmBtu)</u>	<u>Emissions</u> <u>(Ton/Mo) (Ton/Yr)</u>	
9.9	NO _x	0.098	0.5	4.3
	CO	0.082	0.4	3.6
	VOM	0.0054	0.02	0.23

These limits are based on standard AP-42 emission factors. Compliance with the annual limits shall be determined from a running total of 12 months of data.

- b. Natural gas shall be the only fuel(s) fired in the fuel combustion equipment. Use of any other fuel will require a revised permit.
5. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
6. The Permittee shall maintain records of the following items, and such other items as may be appropriate to allow the Illinois EPA to review compliance with the limits in this permit.
 - a. Usage of each material (tons/month and tons/year);
 - b. VOM and HAP content, as applied, of each material (wt. %); and
 - c. Detailed calculations of VOM and HAP emissions (tons/month and tons/year).

7. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
8. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
9. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

10. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
 - a. Usage of each material (tons/month and tons/year);
 - b. VOM and HAP content, as applied, of each material (wt. %); and
 - c. Detailed calculations of VOM and HAP emissions (tons/month and tons/year).

It should be noted that the 3 slitters and shredder controlled by dust collector are exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(aa).

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It should be noted that this permit has been revised to change the VOM content and emission limits for the printing and coating operations as requested by the company.

It should also be noted that 2 printers, a laminator and extruder from Construction Permit 03060064 has been incorporated into this permit and material usage and emissions have been increased.

If you have any questions on this, please call Randy Solomon at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

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cc: Illinois EPA, FOS Region 3
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary - Revised

This attachment provides a summary of the maximum emissions from the coating and printing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is using less than 98.0 tons per year of VOM in the materials used for the coating and printing process. The resulting maximum emissions are well below the levels, e.g., 100 tons per year of volatile organic material, 10 tons per year of any individual hazardous air pollutants (HAPs), and 25 tons per year of a combination of such HAPs at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, less coating is used or a lower VOM content material is used and control measures are more effective than required in this permit.

1. Emissions and operation of the coating and printing processes shall not exceed the following limits:

<u>Material</u>	<u>Material Usage</u>		<u>VOM</u>	<u>VOM Emissions</u>	
	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>Content (Wt. %)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
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Water-Based Ink	4.8	38.3	13.5	0.4	5.17
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Overcoat	0.3	2.5	4.0	<u>0.1</u>	<u>0.1</u>
			Total	12.23	98.0

These limits are based on the maximum material usage and the maximum VOM content. Compliance with the annual limits shall be determined from a running total of 12 months of data.

2. Emissions and operation of the fuel combustion equipment shall not exceed the following limits:

<u>Total Maximum Firing Rate</u>	<u>Pollutant</u>	<u>Emission</u>	<u>Emissions</u>	
		<u>Factor (Lb/mmBtu)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
9.9	NO _x	0.098	0.5	4.3
	CO	0.082	0.4	3.6
	VOM	0.0054	0.02	0.23

These limits are based on standard AP-42 emission factors. Compliance with the annual limits shall be determined from a running total of 12 months of data.

3. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.

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